IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

IN RE DRY MAX PAMPERS LITIGATION : C

CASE NO. No. 1:10-cv-00301-SJD

: (Judge Timothy S. Black)

MOTION OF DEFENDANTS FOR

LEAVE TO FILE JOINT MOTION

FOR FINAL APPROVAL OF

SETTLEMENT IN EXCESS OF

TWENTY PAGES

Pursuant to S.D. Ohio Civ. R. 7.2(a)(3), Defendants The Procter & Gamble Company, The Procter & Gamble Paper Products Company and The Procter & Gamble Distributing LLC (collectively "Procter & Gamble") request leave to file the Joint Motion of Plaintiffs and Defendants for Final Approval of Settlement ("Joint Motion for Final Approval") in excess of this Court's twenty-page limit on the length of memoranda. The Joint Motion for Final Approval will not exceed fifty pages in length.

A proposed order granting this motion is attached as Exhibit 1.

Respectfully submitted,

/s/ D. Jeffrey Ireland

D. Jeffrey Ireland (0010443), Trial Attorney Brian D. Wright (0075359) FARUKI IRELAND & COX P.L.L. 500 Courthouse Plaza, S.W. 10 North Ludlow Street Dayton, OH 45402 Telephone: (937) 227-3710

Telecopier: (937) 227-3749 Email: djireland@ficlaw.com

Attorneys for Defendants
The Procter & Gamble Company,
The Procter & Gamble Paper Products
Company and The Procter & Gamble
Distributing LLC

MEMORANDUM IN SUPPORT OF MOTION OF DEFENDANTS FOR LEAVE TO FILE JOINT MOTION FOR FINAL APPROVAL OF SETTLEMENT IN EXCESS OF TWENTY PAGES

Defendants The Procter & Gamble Company, The Procter & Gamble Paper

Products Company and The Procter & Gamble Distributing LLC (collectively "Procter & Gamble") seek leave to file the Joint Motion of Plaintiffs and Defendants for Final Approval of

Settlement ("Joint Motion for Final Approval") in excess of twenty pages. Leave to file the Joint

Motion for Final Approval exceeding the page limitation is appropriate as additional pages are

necessary for Plaintiffs and Defendants to address adequately the reasons that this Court should

grant final approval of the Settlement and to respond to the objections submitted to this Court.

The Joint Motion for Final Approval will not exceed fifty pages in length.

Plaintiffs and Defendants will comply with S.D. Ohio Civ. R. 7.2(a)(3), which requires "a combined table of contents and a succinct, clear and accurate summary, not to exceed five (5) pages, indicating the main sections of the memorandum, the principal arguments and citations to primary authority made in each section, as well as the pages on which each section and any sub-sections may be found."

Respectfully submitted,

/s/ D. Jeffrey Ireland

D. Jeffrey Ireland (0010443), Trial Attorney Brian D. Wright (0075359) FARUKI IRELAND & COX P.L.L. 500 Courthouse Plaza, S.W. 10 North Ludlow Street Dayton, OH 45402 Telephone: (937) 227-3710

Telephone: (937) 227-3710 Telecopier: (937) 227-3749 Email: djireland@ficlaw.com

Attorneys for Defendants
The Procter & Gamble Company,
The Procter & Gamble Paper Products
Company and The Procter & Gamble
Distributing LLC

CERTIFICATE OF SERVICE

I certify that on September 14, 2011, I electronically filed the foregoing Motion of Defendants for Leave to File Joint Motion for Final Approval of Settlement in Excess of Twenty Pages with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

Gary D. Greenwald Mark D. Samson KELLER ROHRBACK P.L.C. 3101 North Central Avenue, Suite 1400 Phoenix, AZ 85012

Lynn Lincoln Sarko Michael D. Woerner Gretchen Freeman Cappio Gretchen S. Obrist Harry Williams IV KELLER ROHRBACK L.L.P. 1201 Third Avenue, Suite 3200 Seattle, WA 98101

David S. Preminger KELLER ROHRBACK L.L.P. 770 Broadway, 2nd Floor New York, NY 10003

Lead Class Counsel

and I hereby certify that I have mailed by first class U.S. mail, postage prepaid, the document to the non-CM/ECF participants:

Theodore J. Froncek 1208 Sycamore Street Cincinnati, OH 45202

Adam Ezra Schulman CENTER FOR CLASS ACTION FAIRNESS LLC 1718 M Street NW, No. 236 Washington, D.C. 20036

Attorneys for Daniel Greenberg

Bonner C. Walsh 904 Mission Ave. Athens, TX 75751

Donald K. Nace 1000 Suffolk Court Cedar Park, TX 78613

/s/ Brian D. Wright
Brian D. Wright